

FILED  
U.S. DISTRICT COURT  
SAVANNAH DIV.

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF GEORGIA  
SAVANNAH DIVISION

2012 FEB 10 PM 4:06

UNITED STATES OF AMERICA

v.

ELIJAH AKEEN SAMPSON, aka  
"SHAWN"

CLERK  
INDICTMENT NO. SO. DIST. OF GA.  
CR 412 18  
VIO: 21 U.S.C. § 841(a)(1)  
DISTRIBUTION OF  
CONTROLLED SUBSTANCES  
18 U.S.C. § 922(a)(1)  
UNLICENSED DEALING  
IN FIREARMS  
18 U.S.C. § 924(c)  
CARRY FIREARMS DURING/  
IN RELATION TO DRUG  
TRAFFICKING  
18 U.S.C. § 922(g)(1)  
POSSESSION OF FIREARMS  
BY CONVICTED FELON  
18 U.S.C. § 922(k)  
POSSESSION OF FIREARM  
WITH OBLITERATED  
SERIAL NUMBER

THE GRAND JURY CHARGES:

COUNT ONE  
(DISTRIBUTION OF COCAINE)

On or about June 22, 2011, in Chatham County, within the Southern District of Georgia,  
the defendant, **ELIJAH AKEEN SAMPSON**, aka "**SHAWN**," did knowingly and intentionally  
distribute a quantity of cocaine hydrochloride, a Schedule II controlled substance;

In violation of Title 21, United States Code, Section 841(a)(1).

**COUNT TWO**  
**(DISTRIBUTION OF COCAINE)**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about July 19, 2011, in Chatham County, within the Southern District of Georgia, the defendant, **ELIJAH AKEEN SAMPSON, aka "SHAWN,"** did knowingly and intentionally distribute a quantity of cocaine base, commonly known as "crack," a Schedule II controlled substance;

In violation of Title 21, United States Code, Section 841(a)(1).

**COUNT THREE**  
**(DISTRIBUTION OF CONTROLLED SUBSTANCE)**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about August 24, 2011, in Chatham County, within the Southern District of Georgia, the defendant, **ELIJAH AKEEN SAMPSON, aka "SHAWN,"** did knowingly and intentionally distribute a quantity of 3, 4-methylenedioxymethamphetamine, a Schedule I controlled substance;

In violation of Title 21, United States Code, Section 841(a)(1).

**COUNT FOUR**  
**(DISTRIBUTION OF COCAINE)**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about August 25, 2011, in Chatham County, within the Southern District of Georgia, the defendant, **ELIJAH AKEEN SAMPSON, aka "SHAWN,"** did knowingly and intentionally distribute a quantity of cocaine hydrochloride, a Schedule II controlled substance;

In violation of Title 21, United States Code, Section 841(a)(1).

**COUNT FIVE**  
**(UNLICENSED DEALING IN FIREARMS)**

**THE GRAND JURY FURTHER CHARGES THAT:**

Beginning at least on or about August 31, 2011, and continuing thereafter until at least on or about December 19, 2011, the exact dates being unknown to the Grand Jury, in Chatham County, within the Southern District of Georgia, the defendant, **ELIJAH AKEEN SAMPSON**, aka **"SHAWN,"** aided and abetted by other persons both known and unknown, willfully engaged in the business of dealing in firearms without a license;

In violation of Title 18, United States Code, Sections 922(a)(1)(A) and 924(a)(1)(D).

**COUNT SIX**  
**(FELON IN POSSESSION OF FIREARM)**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about August 31, 2011, in Chatham County, within the Southern District of Georgia, the defendant, **ELIJAH AKEEN SAMPSON**, aka **"SHAWN,"** who before that time had been convicted of a felony, an offense punishable by imprisonment for more than one year, did knowingly possess, in and affecting interstate commerce, a firearm, that is, a Marlin, Model 60, .22 caliber rifle, Serial Number 04235433;

In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT SEVEN**  
**(DISTRIBUTION OF COCAINE)**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about September 22, 2011, in Chatham County, within the Southern District of

Georgia, the defendant, **ELIJAH AKEEN SAMPSON**, aka “**SHAWN**,” did knowingly and intentionally distribute a quantity of cocaine hydrochloride, a Schedule II controlled substance; In violation of Title 21, United States Code, Section 841(a)(1).

**COUNT EIGHT**  
**(DISTRIBUTION OF COCAINE)**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about September 28, 2011, in Chatham County, within the Southern District of Georgia, the defendant, **ELIJAH AKEEN SAMPSON**, aka “**SHAWN**,” did knowingly and intentionally distribute a quantity of cocaine hydrochloride, a Schedule II controlled substance; In violation of Title 21, United States Code, Section 841(a)(1).

**COUNT NINE**  
**(DISTRIBUTION OF COCAINE)**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about October 26, 2011, in Chatham County, within the Southern District of Georgia, the defendant, **ELIJAH AKEEN SAMPSON**, aka “**SHAWN**,” did knowingly and intentionally distribute a quantity of cocaine hydrochloride, a Schedule II controlled substance; In violation of Title 21, United States Code, Section 841(a)(1).

**COUNT TEN**  
**(CARRY FIREARM DURING/IN RELATION TO DRUG TRAFFICKING)**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about October 26, 2011, in Chatham County, within the Southern District of Georgia, the defendant, **ELIJAH AKEEN SAMPSON**, aka “**SHAWN**,” knowingly and unlawfully, and during and in relation to the drug trafficking offense charged in Count Nine,

used and carried a firearm, that is, a Cobra Enterprises, Model CA380, .380 caliber semiautomatic pistol, Serial Number CP028931;

In violation of Title 18, United States Code, Section 924(c).

**COUNT ELEVEN**  
**(FELON IN POSSESSION OF FIREARM)**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about October 26, 2011, in Chatham County, within the Southern District of Georgia, the defendant, **ELIJAH AKEEN SAMPSON, aka "SHAWN,"** who before that time had been convicted of a felony, an offense punishable by imprisonment for more than one year, did knowingly possess, in and affecting interstate commerce, a firearm, that is, a Cobra Enterprises, Model CA380, .380 caliber semiautomatic pistol, Serial Number CP028931; In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT TWELVE**  
**(FELON IN POSSESSION OF FIREARM)**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about November 10, 2011, in Chatham County, within the Southern District of Georgia, the defendant, **ELIJAH AKEEN SAMPSON, aka "SHAWN,"** who before that time had been convicted of a felony, an offense punishable by imprisonment for more than one year, did knowingly possess, in and affecting interstate commerce, a firearm, that is, a Taurus, Model 80, .38 special caliber revolver, Serial Number 819459; In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT THIRTEEN**  
**(DISTRIBUTION OF COCAINE)**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about November 16, 2011, in Chatham County, within the Southern District of Georgia, the defendant, **ELIJAH AKEEN SAMPSON**, aka “**SHAWN**,” did knowingly and intentionally distribute a quantity of cocaine hydrochloride, a Schedule II controlled substance; In violation of Title 21, United States Code, Section 841(a)(1).

**COUNT FOURTEEN**  
**(CARRY FIREARM DURING/IN RELATION TO DRUG TRAFFICKING)**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about November 16, 2011, in Chatham County, within the Southern District of Georgia, the defendant, **ELIJAH AKEEN SAMPSON**, aka “**SHAWN**,” knowingly and unlawfully, and during and in relation to the drug trafficking offense charged in Count Thirteen, used and carried a firearm, that is, a Smith & Wesson, Model 64, .38 special revolver, Serial Number 56975; In violation of Title 18, United States Code, Section 924(c).

**COUNT FIFTEEN**  
**(FELON IN POSSESSION OF FIREARM)**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about November 16, 2011, in Chatham County, within the Southern District of Georgia, the defendant, **ELIJAH AKEEN SAMPSON**, aka “**SHAWN**,” who before that time had been convicted of a felony, an offense punishable by imprisonment for more than one year,

did knowingly possess, in and affecting interstate commerce, a firearm, that is, a Smith & Wesson, Model 64, .38 special revolver, Serial Number 56975;  
In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT SIXTEEN**  
**(DISTRIBUTION OF COCAINE)**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about December 19, 2011, in Chatham County, within the Southern District of Georgia, the defendant, **ELIJAH AKEEN SAMPSON, aka "SHAWN,"** did knowingly and intentionally distribute a quantity of cocaine hydrochloride, a Schedule II controlled substance;  
In violation of Title 21, United States Code, Section 841(a)(1).

**COUNT SEVENTEEN**  
**(CARRY FIREARM DURING/IN RELATION TO DRUG TRAFFICKING)**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about December 19, 2011, in Chatham County, within the Southern District of Georgia, the defendant, **ELIJAH AKEEN SAMPSON, aka "SHAWN,"** knowingly and unlawfully, and during and in relation to the drug trafficking offense charged in Count Sixteen, used and carried a firearm, that is, a Taurus, Model PT-25, .25ACP caliber semiautomatic pistol, with obliterated serial number;  
In violation of Title 18, United States Code, Section 924(c).

**COUNT EIGHTEEN**  
**(FELON IN POSSESSION OF FIREARM)**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about December 19, 2011, in Chatham County, within the Southern District of Georgia, the defendant, **ELIJAH AKEEN SAMPSON, aka "SHAWN,"** who before that time

had been convicted of a felony, an offense punishable by imprisonment for more than one year, did knowingly possess, in and affecting interstate commerce, a firearm, that is, a Taurus, Model PT-25, .25ACP caliber semiautomatic pistol, with obliterated serial number;

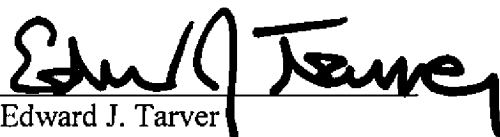
In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT NINETEEN**  
**(POSSESSION OF FIREARM WITH OBLITERATED SERIAL NUMBER)**

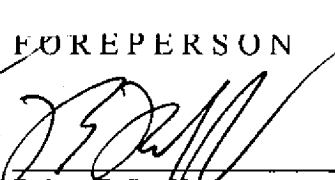
**THE GRAND JURY FURTHER CHARGES THAT:**


On or about December 19, 2011, in Chatham County, within the Southern District of Georgia, the defendant, **ELIJAH AKEEN SAMPSON**, aka "**SHAWN**," did knowingly and unlawfully possess a firearm, which had previously been shipped and transported in interstate and foreign commerce, that is, a Taurus, Model PT-25, .25ACP caliber semiautomatic pistol, which had the importer's or manufacturer's serial number removed, obliterated, and altered; In violation of Title 18, United States Code, Section 922(k).

A TRUE BILL.

  
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FOREPERSON  
  
Brian T. Rafferty  
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